

Approved, SCAO

Original - Court  
1st Copy- Defendant2nd Copy - Plaintiff  
3rd Copy -ReturnSTATE OF MICHIGAN  
THIRD JUDICIAL CIRCUIT  
WAYNE COUNTY

## SUMMONS

CASE NO.  
22-009440-CZ  
Hon.Susan L. Hubbard

Court address : 2 Woodward Ave., Detroit MI 48226

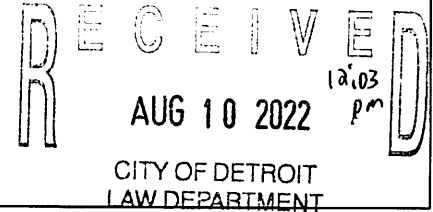
Court telephone no.: 313-224-5183

Plaintiff's name(s), address(es), and telephone no(s)  
8K GR, LLC

v

Defendant's name(s), address(es), and telephone no(s).  
City of Detroit

Plaintiff's attorney, bar no., address, and telephone no

Ryan Evan Hill 68445  
407 E Fort St Ste 103  
Detroit, MI 48226-2959

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

## Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

## Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☐ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ \_\_\_\_\_ Court,

where it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_.

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS

## NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party or **take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date  
8/8/2022Expiration date\*  
11/7/2022Court clerk  
Carlita McMiller

Cathy M. Garrett- Wayne County Clerk.

\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

MC 01 (9/19)

SUMMONS

MCR 1.109(D), MCR 2.102(B), MCR 2.103, MCR 2.104, MCR 2.105



**STATE OF MICHIGAN  
IN THE THIRD CIRCUIT COURT FOR THE COUNTY OF WAYNE  
CIVIL DIVISION**

**8K GR, LLC**

Case No. 22-      -CZ  
Hon.

Plaintiff,

vs.

**CITY OF DETROIT,  
SANDRA STAHL,  
JANE DOE**

Defendant.

---

**DETROIT LEGAL GROUP, PLLC**

Ryan E. Hill (P68445)  
Colemon L. Potts (P78607)  
Attorneys for Plaintiff  
407 E. Fort St., Ste. 103  
Detroit, Michigan 48226  
(313) 962-4954

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*There is no resolved or unresolved civil action arising out of the same transaction or occurrence alleged in this complaint*

**COMPLAINT**

**NOW COMES** Plaintiff, 8K GR, LLC, by and through its attorneys, **DETROIT LEGAL GROUP, PLLC** and for its Complaint respectfully represent to the Court as follows:

**PARTIES AND JURISDICTION**

1. Plaintiff is a resident of or does business in the County of Wayne, State of Michigan.
2. Defendants are residents or do business in the County of Wayne, State of Michigan.
3. The events giving rise to this action occurred in the County of Wayne, State of Michigan.
4. The amount in controversy exceeds \$25,000.00, exclusive of interest and costs.

5. Venue is proper in this Court pursuant to MCL 600.1621 (a), for the reason that this is the City in which the Defendant does business in or the events took place in the City of Detroit, County of Wayne, State of Michigan.

**General Allegations**

6. Plaintiff is the owner of commercial property located at 8447 Grand River, Detroit, MI (“Subject Property”).
7. Plaintiff is currently rehabbing the property for purposes that include a restaurant.
8. Prior to purchasing the property, the property was used as a restaurant known as “Steve’s Soul Food.”
9. The property still had signage and was protected by a wrought iron fence.
10. During Plaintiff’s attempt to rehabilitate the property, Defendant has continued to issue blight tickets to Plaintiff.
11. Plaintiff has taken many corrective measures to keep the property in good repair during the course of the rehab.
12. Unfortunately, because Plaintiff has dealt with several break ins at the subject property and the lack of available contractors, staying the course is not always easy.
13. Again, the Defendant has continued to issue blight tickets to Plaintiff which he has consistently addressed.
14. With regards to certain issues, instead of just paying a fine, Plaintiff has asked for formal hearings.
15. However, on or about April 26, 2022, prior to the hearing date to address issues specifically regarding Plaintiff’s signs and wrought iron fence, upon information and belief the Director

of the General Services Department for the City of Detroit, Sandra Stahl ordered that Motor City Preservation take down Plaintiff's signage and take down its wrought iron fence.

16. All of the aforementioned items were the subject of alleged blight violations that had yet to be heard.

17. In fact, the matters are still pending with DAH.

18. Plaintiff was deprived of his property without due process.

19. As a result, Plaintiff has been damaged as aforesaid.

#### **COUNT I: COMMON LAW CONVERSION**

20. Plaintiff hereby incorporates and re-alleges the allegations set forth in paragraphs one through nineteen above, inclusive as if more fully set forth herein.

21. Plaintiff has made repeated demands and reasonable efforts to obtain his property.

22. Defendants have committed a distinct act of dominion, which was wrongfully exerted over Plaintiff's property.

23. Defendants' failure to convey the property to Plaintiff constitutes conversion.

24. That as a result, Plaintiff has been damaged aforesaid

#### **COUNT II: STATUTORY CONVERSION**

25. Plaintiff hereby incorporates and re-alleges the allegations set forth in paragraphs one through twenty-four above, inclusive as if more fully set forth herein.

26. Plaintiff has made repeated demands and reasonable efforts to obtain its property.

27. Defendants have converted Plaintiff's property to their own personal use.

28. Defendants failed to convey the property, which constitutes statutory conversion when Plaintiff's repeated demands for the return of its property were ignored.

29. Plaintiff is entitled to recovery of treble damages, costs, and attorney's fees; other rights or remedies.

30. That as a result, Plaintiff has been damaged as aforesaid.

**COUNT III – GROSS NEGLIGENCE**

31. Plaintiff hereby incorporates and re-alleges the allegations set forth in Paragraphs one through thirty above, inclusive, as if more fully set forth herein.

32. Defendant's conduct was so reckless as to demonstrate a substantial lack of concern for whether an injury resulted from their conduct in demolishing the Plaintiff's property and chattels located therein.

33. As a direct and proximate result of the Defendant's grossly negligent conduct, Plaintiff has suffered damages to its property and the loss of the use thereof, as well as the loss of profits from the rental of the property.

34. That as a result of such reckless conduct, Plaintiff has been damaged aforesaid.

**COUNT IV – 42 U.S.C. § 1983 AND FIFTH AND FOURTEENTH AMENDMENTS**

**BY PLAINTIFF AGAINST CITY OF DETROIT**

35. Plaintiff hereby incorporates and re-alleges the allegations set forth in Paragraphs one through thirty-four above, inclusive, as if more fully set forth herein.

36. By their conduct, as described herein, and acting under color of state law to deprive the Plaintiff of his rights to of substantive and procedural due process under the Fifth and Fourteenth Amendments, the Defendants are liable for violation of 42 U.S.C. § 1983 which prohibits the deprivation under color of state law of rights secured under the United States Constitution.

37. As a consequence of the Defendant's actions, Plaintiff has suffered violations of their Fifth and Fourteenth Amendments right to substantive and procedural due process. Through these actions, Defendants are liable for violation of 42 U.S.C. § 1983 which prohibits the deprivation under color of state law of rights secured under the United States Constitution.
38. As a direct and proximate result of the Defendants' actions, Plaintiff has suffered damages.

**RELIEF REQUESTED**

**WHEREFORE**, Plaintiff respectfully prays that this Honorable Court enter a judgement in his favor and against Defendants, in sum that exceeds twenty-five thousand dollars (\$25,000.00) without limitations, as the proofs might demonstrate with all the special damages and general damages sustained by Plaintiff, as well as all interest costs, and actual attorney's fees.

**Dated: August 3, 2022.**

**DETROIT LEGAL GROUP, PLLC,**

/s/Colemon L. Potts  
**Colemon L. Potts (P-78607)**  
/s/Ryan E. Hill  
**Ryan E. Hill (P-68445)**

**STATE OF MICHIGAN  
IN THE THIRD CIRCUIT COURT FOR THE COUNTY OF WAYNE  
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**8K GR, LLC**

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Hon.

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SANDRA STAHL,  
JANE DOE**

Defendants.

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Colemon L. Potts (P78607)  
Attorneys for Plaintiff  
407 E. Fort St., Ste. 103  
Detroit, Michigan 48226  
(313) 962-4954

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**PLAINTIFF'S JURY DEMAND**

Plaintiff, by counsel, pursuant to Michigan Court Rules 2.508(B), demands a trial by jury and herewith submits the required jury fee.

/s/Ryan E. Hill  
Ryan E. Hill P68445

22-009440-CZ FILED IN MY OFFICE Cathy M. Garrett WAYNE COUNTY CLERK 8/8/2022 5:23 PM Carlita McMiller

Approved, SCAO

Original - Court  
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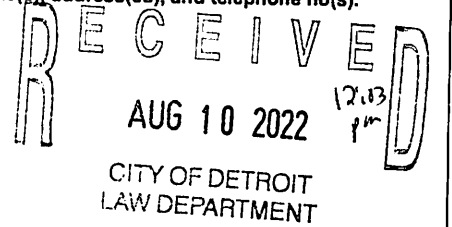
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Hon.Susan L. Hubbard

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8K GR, LLC

Plaintiff's attorney, bar no., address, and telephone no

Ryan Evan Hill 68445  
407 E Fort St Ste 103  
Detroit, MI 48226-2959Defendant's name(s), address(es), and telephone no(s).  
Stahl, Sandra

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**Dated: August 3, 2022.**

**DETROIT LEGAL GROUP, PLLC,**

/s/Colemon L. Potts  
**Colemon L. Potts (P-78607)**  
/s/Ryan E. Hill  
**Ryan E. Hill (P-68445)**

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Plaintiff, by counsel, pursuant to Michigan Court Rules 2.508(B), demands a trial by jury and herewith submits the required jury fee.

/s/Ryan E. Hill  
Ryan E. Hill P68445